

What Counts for Learners

Closing the Gap Between Competency-Based
Learning Models, Practice, and Policy



The field recognizes the need to make high school more meaningful for students, and competency-based learning (CBL) has emerged as a promising strategy for making that happen. However, the field lacks a shared picture of what CBL looks like for learners and a coherent way to measure learning when it is no longer bound to traditional structures such as seat time, standardized assessments, and fixed schedules. FullScale took a deep dive into ten high schools across seven states to understand what students encounter within a diverse set of CBL models and which policies help or hinder that work. This report shares what we discovered, traces learners' experiences to the state and local conditions that shape them, and offers concrete steps for the field to further advance competency-based learning.

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High schools across the country have taken steps to make learning more relevant, authentic, and connected to life after graduation. Competency-based learning (CBL) has become central to that effort. Built on the idea that students should advance by demonstrating what they know and can do, CBL challenges the traditional systems that define learning based on seat time.

“Clark Street is a school where learners who like to learn can do that ... [it] has given them that outlet to foster their engagement, to see school reimagined, to enjoy their learning again, because it is a place where learning isn’t just okay. I’m getting an A. I’m passing my class.” —Clark Street student

Policy at the state and local levels has shifted alongside this practice. More than 20 states either have a statewide Portrait of a Graduate or similar vision document, or require local systems to develop one, that addresses both academic and durable skills learners should be able to demonstrate by the time they graduate. Relatedly, over 40 states allow students to progress toward graduation and earn credits through demonstrations of competency.

However, despite increased interest and practical and policy action, the field has little agreement about what CBL looks like at the level of the learner and limited evidence about the policy conditions that make that experience possible.

Without shared language, the field cannot tell whether CBL is reaching or working for learners or whether and how policy movements enable that impact.

This report seeks to begin to close the gaps, exploring the emerging models, practices, and policies that support competency-based experiences at the level of the learner.



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The Field Adopted a Label Before It Defined an Experience

In winter 2026, [FullScale](#) (the merged organization of The Learning Accelerator and Aurora Institute) conducted a [national landscape scan](#) and examined 106 high schools across more than 30 states engaged in competency-based learning or related redesign. The sample spanned traditional district schools, public charters, and innovation-focused programs.

The scan revealed that although CBL is experiencing broader adoption, schools define it in very different ways. Some articulated competencies clearly and connected them to student work. Others referenced competencies in general terms, with no explanation of how they shape instruction, assessment, or progression. Schools used similar language to describe personalized, project-based, deeper learning, and whole-child models, which made it difficult to identify what was specific to CBL.

Across public materials, schools described the goals and design features of CBL more often than the practices that make it work, particularly assessment, mastery-based progression, and aligned supports. **CBL is advancing faster than the field's shared systems for defining, supporting, and measuring its quality.** Lacking that clarity, funders and policymakers risk investing without understanding implementation and evaluating without fully understanding the potential methods for capturing progress.

Put together, the field has been mistaking the model for the learning. In doing so, we've fallen into a pattern of using a term that describes structures but without understanding what it means for learners in schools and classrooms. As a result, student learning experiences continue to vary widely despite leaders who use common terms to describe them.

Flexible schedules, portfolios, proficiency scales, and mastery transcripts are visible and easy to adopt. On their own, they do not change what students experience. CBL delivers on its promise when competencies become consequential for learners, shaping what they work toward, how they improve, what counts as progress, and what happens next. **CBL is more than a structure to install. It is a set of core practices that directly shape the learner experience.**

This report leverages deep research in ten schools across seven states to help readers close the gap between models, practices, and policy, starting concretely from the learner's perspective and experience with CBL. The [landscape scan](#), published in spring 2026, showed what the field can see from the outside. FullScale then went inside ten of those high schools to understand what learners actually experience, and examined the local and state policy conditions that enabled or hindered those learning opportunities.



Study Overview

- * 10 high schools across 7 states, selected from the 106 in the landscape scan
- * 1,350 student survey responses and 141 teacher survey responses
- * 49 classroom visits producing 97 observation records
- * 105 learners in focus groups
- * 17 policy conversations with 45 participants
- * School materials, policy documents, and a ten-site document scan

The study purposefully included high schools with substantive competency-based approaches and available evidence of learner success. It was designed to describe learner experiences and the conditions surrounding them, not to determine that CBL caused outcomes or to identify one preferred model. [Read the full research report to learn more.](#)

Practice: What Is CBL? Ten Schools, Ten Approaches, and Three Defining Markers

FullScale selected ten high schools from the 106 in the landscape scan for deeper study. Each had a substantive competency-based approach and available evidence of learner success. Together they represented meaningful variation in context and model design. The schools span seven states and range from 58 to 1,137 high school learners. They include traditional schools, district programs, and public charters in rural, suburban, and urban communities.

That variation was intentional. If similar learner experiences appeared across schools that share no common architecture, the field could focus on what learners experience rather than on the details of any particular model. The ten schools organize learning in five distinct ways, and each uses a different competency framework, ranging from academic standards and mastery targets to schoolwide *Habits of Mind* (Table 1). These groupings foreground how learning is organized across the participating sites. Schools within the same group may use different policy pathways, while schools with similar sources of authority may organize learning differently. Lindsay, Northern Cass, and Harwood all use district proficiency systems, for example, but those systems operate through different relationships among local design, state mastery-credit authority, and statewide proficiency-based graduation requirements. The policy comparison that follows examines those distinctions.

To understand what CBL looks like across different settings, FullScale drew on a crosswalk of more than 20 existing frameworks, research studies, and learning agendas to identify ten learner-level *markers* of competency-based learning and then refined them through review by researchers and an advisory board of experts.¹ The markers span two dimensions, learning design and assessment. Each describes what becomes visible when competencies meaningfully shape learning.

¹ FullScale would like to thank the members of the CBL Advisory Board, who have provided invaluable feedback and guidance during this study. They include: Michael Crawford, America Succeeds; Bree Dusseault, CRPE; Jason Glass, Palo Alto Unified School District; Jillian Juman, Envision Education; Babak Mostaghimi, Learner Studio; Nikolas Namba, Transcend; Lillian Pace, KnowledgeWorks; Elena Silva, Learning Policy Institute; Laura Slover, Skills for the Future; Brook Stafford-Brizard, Carnegie Foundation.

TABLE 1
HOW LEARNING IS ORGANIZED AND WHAT IT LOOKS LIKE IN EACH OF THE TEN SCHOOLS

DEFINING ORGANIZATIONAL FEATURE	HIGH SCHOOL, STATE	COMPETENCY FRAMEWORK	WHAT LEARNING LOOKS LIKE
Schoolwide learning organized around competency evidence	Clark Street Community School, Wisconsin	Academic and transferable competencies	Learners develop <i>Artifacts</i> as competency evidence, use common performance criteria, and track progress through learning records and portfolios.
	Compass Community Collaborative School, Colorado	Thirty-two academic and transferable competencies	Personalized pathways, portfolios, exhibitions, and community-connected experiences allow learners to develop and demonstrate competencies through varied forms of evidence.
Districtwide proficiency systems	Lindsay High School, California	Course learning and mastery targets alongside broader <i>Lifelong Learning Standards</i>	A learning-management platform, flexible use of time, feedback, intervention, and career pathways support learners in understanding and progressing toward competency.
	Northern Cass, North Dakota	Academic standards and a <i>Portrait of a Learner</i> describing broader competencies	A districtwide competency-based system combines proficiency scales, flexible pacing, studios, inquiry, and community-connected learning. Learners build evidence toward proficiency and may continue working on unmet standards across school years.
	Harwood Union High School, Vermont	Six schoolwide competencies, called <i>Learning Expectations</i>	District Learning Expectations and common proficiency criteria connect courses and approved flexible pathways within Vermont's proficiency-based graduation framework. Learners develop and demonstrate proficiency through coursework and experiences beyond school.
Personalized program within a conventional high school	Empower[Ed], North Dakota	Academic standards used as competencies, alongside <i>College and Career Readiness Practices</i>	Learners use evidence of mastery to prioritize work, progress at different rates, and demonstrate learning through interest- and career-connected projects.

DEFINING ORGANIZATIONAL FEATURE	HIGH SCHOOL, STATE	COMPETENCY FRAMEWORK	WHAT LEARNING LOOKS LIKE
Courses and credits retained, assessment and progression redesigned	STEAM Academy, Kentucky	<i>Six shared competencies, called STEAM Habits, alongside academic standards</i>	Projects, feedback, and Defenses of Learning connect academic expectations and broader competencies across the high school experience.
	Crosstown High, Tennessee	<i>XQ Competencies</i>	Competencies are incorporated into coursework and annual Presentations of Learning, where learners select evidence and explain their academic and transferable learning.
	Del Lago Academy, California	<i>Course-level competencies, called Essential Course Competencies</i>	Performance tasks, revision, reassessment, interdisciplinary projects, internships, and presentations provide multiple opportunities to demonstrate proficiency.
	Da Vinci Communications, California	<i>Course-level Essential Knowledge & Skills and broader Habits of Mind</i>	Projects, rubrics, feedback cycles, presentations, and career-connected experiences help learners develop, apply, and explain competency evidence.

Viewed through the markers, each data source revealed a different part of the learner experience, from surveys and classroom observations to focus groups and school materials. Where the landscape scan found mastery-based progression, feedback and revision, and evidence of learning among the least visible elements in schools' public materials, inside the ten high schools, they were the most consistently present. While evidence of all ten markers could be observed, three appeared most consistently, and students could describe them in their own words.



What you can show determines what comes next (*Mastery-Based Progression*)

“Compared to regular school, like learning a subject and then just taking a test and moving on to the next thing, here, you can research at your own pace, sit down, do an assessment. For me personally, it sticks in my brain better, rather than just learning, testing, throwing it out.” —Empower[Ed] student

Your strongest evidence counts, not your first attempt (*Iterative Purpose*)

“When we’re doing our Artifacts, it’s a process of brainstorming, draft, review, revise, clarify, revise, teacher review, revise, and then turn in the final artifact. Then they grade it, and it’s handed back to us, and we get to look through and see. We look at comments and such that are put in there, and then sometimes teachers will write on there very close to proficient. Revise one more time, and then re-submit even if the class has ended.” —Clark Street student

Real work counts as evidence of learning (*Rigorous Application of Learning*)

*“... as a teacher assistant for the teacher, I can help. So one of the things that I had to do was, like a real world example, where I had to teach them what are good, like test strategies for a person who has very bad anxiety ... And I feel like that’s great because a year ago, I wouldn’t have guessed that I would be doing something like that. And I feel like the school has a very great way of pushing you into something.”
—Crosstown High student*

The other seven markers emerged across schools and shaped students’ varying CBL experiences. The three recurring markers—mastery-based progression, iterative purpose, and rigorous application—offer the clearest cross-site signals of where competency shaped learning and give the field shared language that travels across models.

It’s critical to note that these CBL experiences occurred in schools where learners also succeeded on conventional measures. Participating schools demonstrate success on state assessments, standardized measures such as STAR and MAP, advanced coursework, graduation rates, and postsecondary enrollment. Del Lago Academy reported a 97.8% four-year graduation rate compared with 86.8% districtwide. At Clark Street, 82.5% of tested learners met or exceeded expectations in English language arts, compared with 75.6% at the district’s comprehensive high school. At Del Lago Academy and Northern Cass, where local competency records could be linked to external data, learners with stronger competency performance also tended to perform more strongly on state assessments and nationally normed measures. Because the study selected schools in part for available evidence of learner success, these results describe settings where competency-based experiences were visible. They do not show that CBL produced those outcomes. FullScale’s [full research report](#) on these schools and the learner experiences found in them presents the full outcomes analysis.

Policy: Five Routes, Ten Different Model Contexts

The three recurring markers appeared across ten schools that share little in common at surface level. The next question is: *what policy conditions made those experiences possible, and what can we learn from them?*

When funders, policymakers, and education leaders ask whether a state supports CBL, they usually mean whether it offers an authorizing mechanism, such as a mastery-credit statute, a waiver pathway, or charter authority. Policy conversations often start and end there. In this study, all ten schools gained formal standing through one of five routes (Table 2). Each route, however, is only the policy or governance arrangement that makes a model official. It is distinct from the local grading, course completion, and reporting rules that shape a learner’s day, and it says little about what students experience.

TABLE 2
THE POLICY ROUTE THROUGH WHICH EACH SCHOOL GAINED FORMAL STANDING

POLICY ROUTE	HIGH SCHOOL, STATE	WHAT THE ROUTE ESTABLISHED
State proficiency requirements or mastery-credit authority	Harwood Union High School, Vermont	Statewide proficiency-based graduation requirements allow demonstrated proficiency to be used to earn a diploma
	Northern Cass, North Dakota	District board policy adopts the state’s standing mastery-framework, awarding graduation units through demonstrated proficiency
State innovation waiver	Empower[Ed], North Dakota	An approved waiver supplies instructional-time flexibility for the personalized program
Charter governance with school or network operating rules	Clark Street Community School, Wisconsin	An instrumentality charter ² protects calendar, assessment days, interdisciplinary learning, and field experiences
	Compass Community Collaborative School, Colorado	A district-authorized charter establishes the school’s competency domains, mastery transcript, exhibitions, and senior defense
	Crosstown High School, Tennessee	A district-authorized charter creates room for interdisciplinary and project-based learning
	Da Vinci Communications, California	Network board policy codifies mastery-based grading, evidence expectations, and credit rules

² Instrumentality charter schools operate as extensions of their authorizing school districts. Their enrollment, funding, staffing, and academic results are all reported as part of the district’s totals. The district employs the teachers, controls the budget, and retains responsibility for compliance and accountability. As a result, these schools function much like traditional public schools, with limited operational independence despite carrying the charter label. For those reasons, **WILL** has often referred to these schools as “charters in name only.”

POLICY ROUTE	HIGH SCHOOL, STATE	WHAT THE ROUTE ESTABLISHED
Districtwide policy	Lindsay High School, California	District regulation withholds a course grade until a learner reaches proficiency on every required topic
School-level rules within district systems	Del Lago Academy, California	District policy authorizes alternative credit and achievement-based grading
	STEAM Academy, Kentucky	School-level governance establishes grading, Defenses of Learning, and internship expectations

Note. Each school appears once under its primary route. Several use additional mechanisms alongside it.

The policy route itself does reveal where authority sits. State requirements and waivers implicate state decision-makers. District and network rules implicate their governing bodies. School procedures implicate school leaders working within those boundaries. Anyone trying to change a model needs to know which body holds the decision.

What the route does not reveal is how extensively a school reorganized learning.

Within public districts, authority and redesign moved independently. Lindsay High School built one of the most comprehensive competency-based systems in the study without a CBL-specific statute or waiver, using ordinary local authority available to any California district. Empower[Ed] in North Dakota operates under a state innovation waiver that supplied instructional-time flexibility, while conventional grades, credits, and letter grades remained in place. In California, the availability of the authority did not result in more change, whereas in North Dakota, the absence of that authority did not prevent such change from occurring under other permissions.

Charter governance covered the widest spread. Clark Street makes portfolios and demonstrated proficiency consequential for graduation through district policy. Crosstown High embeds competencies, projects, and revision inside Tennessee's course-and-credit structure. The two schools share a route and offer substantially different learner experiences.

Formal standing is necessary, but it explains little about what follows. Authorization does not determine the learner experience. The next question becomes *where those decisions actually sit*.

Outcomes: Deciding What Counts as Evidence of Learning

All three recurring markers depend on the same thing: evidence of competency. That evidence determines what comes next (*Mastery-Based Progression*); it can be strengthened and still count (*Iterative Purpose*); and real work can serve as that evidence (*Rigorous Application of Learning*).

The critical policy question, then, is not whether a state permits, enables, or prevents CBL. It is which rules define evidence of success, because those rules shape the learner experience. Authorization establishes only that a model may exist. It does not determine what learning looks like or what happens to evidence once a learner produces it.

TABLE 3
HOW POLICY ALIGNS WITH THE THREE RECURRING MARKERS

WHAT LEARNERS EXPERIENCE	LEARNING DESIGN AND PRACTICE	LOCAL POLICY AND GOVERNANCE	STATE POLICY
Learners advance through demonstrated learning and continue working where evidence remains incomplete (Mastery-Based Progression)	All ten sites use learning evidence to guide further work, assessment, or advancement. The relationship between competency evidence, course grades, semester deadlines, and credit differs across models.	Nine sites have documented local completion rules.	Six sites have documented state relationships, ranging from Northern Cass's mastery-credit authority to conventional credit requirements at Crosstown. These provisions differ in whether they govern daily progression, alternative completion, or the graduation endpoint.
Learners use feedback, revision, and repeated attempts to strengthen their learning (Iterative Purpose)	Eight sites document feedback and revision or reassessment routines.	Four sites codify feedback, revision, or additional-learning opportunities. Two sites provide related support through varied-evidence requirements or resources for project implementation.	No specific state provision is established as governing these sites' feedback-and-revision routines. The documented decisions about opportunities, timing, and additional evidence sit with local leaders and educators.

WHAT LEARNERS EXPERIENCE	LEARNING DESIGN AND PRACTICE	LOCAL POLICY AND GOVERNANCE	STATE POLICY
Learners apply knowledge and skills to challenging, authentic tasks (Rigorous Application of Learning)	All ten sites rely on educators and partners to design problems, products, audiences, and evidence requirements. Those decisions determine what knowledge learners must apply and what their work demonstrates.	Eight sites have policies, adopted plans, or formal requirements that require, recognize, or resource applied learning.	Five sites connect qualifying applied experiences to state provisions, including workplace-learning rules, flexible pathways, and alternative completion. These provisions give experiences formal standing; educators and partners determine the demands of particular tasks.

Note. Counts describe the roles documented at each school and can overlap across levels. They include implementation and supporting relationships, and they do not measure how fully an experience is implemented.

The rules that define evidence of success are mostly local. California's alternative-completion statute sits behind Del Lago Academy, requiring a passing level on every competency before awarding credit, with reassessment and a Student Success Plan when evidence is incomplete. Similarly, Da Vinci Communications converts aggregate mastery into a course grade, so strength in some competencies can offset unfinished learning in others. Both describe *Mastery-Based Progression*. At one school, unfinished learning must be finished. At the other, it can be averaged away.



California: One Statute, Three Different Definitions of Success

Da Vinci cites [Education Code 51225.3](#) directly in network board policy and yet defines success based on *Essential Knowledge and Skills* (EKS) and *Habits of Mind*. Escondido Union, the authorizing district, cites the same code on Del Lago Academy's behalf, with the school defining what it means for learners. Lindsay has no documented tie to the statute at all.

Where states do define evidence of success, they do so at the endpoint. North Dakota's mastery-credit option ties demonstrated proficiency to graduation units and exempts those units from instructional-time requirements. Vermont requires proficiency-based graduation in every district, defining evidence at the diploma. Neither addresses whether feedback lets a learner strengthen evidence that still counts, or whether work produced for a community partner can serve as evidence at all.

Eight schools document feedback and revision routines, and four codify them locally, but no state provision in the study governs them. That makes Iterative Purpose the marker with the least policy support.



North Dakota: Same Destination, Different School Pathways

North Dakota offers two routes to competency-based credit, and its two participating systems took different ones. Northern Cass adopted the state's standing mastery-framework option through board policy, which already ties demonstrated proficiency to graduation credit. The district extended that definition inward through proficiency scales, multiple-evidence rules, and flexible pacing. Bismarck built Empower[Ed] through the state's innovation and waiver pathway, which lifted instructional-time requirements but did not define how to demonstrate proficiency. Mastery results still become district grades and credits, so Bismarck supplied the standards proficiency scale and grade conversion while building out programs for advising, progress monitoring, and the learner record itself. In both schools, learners encounter progressions shaped by what they demonstrate. One district extended a definition the state had already created. The other supplied one the state has not addressed.

The policy-to-practice mismatch. Across the ten schools, state authority relevant to the three markers was either completely absent or present but disconnected from practice already underway. In both cases, schools made local decisions to make the learning possible.

- * **Completely Absent: Tennessee.** The state's competency-credit provision applies only to virtual schools, its competency-based education pilot has concluded, and its innovation-waiver route excludes charters. Crosstown High adopted the XQ Competencies, a national nonprofit's framework, to do work the state's policy environment does not.
- * **Present but disconnected: Kentucky.** At STEAM Academy, the six STEAM Habits are assessed in every course and carry a defined 15% of the grade, while credit still runs on conventional Carnegie units. Kentucky's performance-based credit regulation fits the model closely but has not been used, so nothing links state policy to the practice already in place. In policy conversations, Kentucky leaders described the same disconnect from the state side, with districts requesting waivers for practices existing authority already allowed.

Policy defines evidence of success at the endpoints. Local rules define it in the learner's day. The two are rarely connected by design, and schools absorb the difference.

The Translation Tax

Each of the ten high schools defined how learners experience and demonstrate competency. The systems that carry that evidence outward, however, were built around traditional measures. To make their evidence recognizable beyond the classroom, the schools had to convert data, maintain parallel records, or build their own mechanisms. That continuous, locally funded work is the **translation tax**.

At least nine of the ten schools translate competency evidence into grades, credits, GPA, course codes, or transcripts, or maintain it alongside them. The work starts in the classroom and moves outward, touching every structure between a learner's experience and the institutions that receive their evidence. Five such structures sit at the center of it.

- 1. The calendar assumes learners move at a shared pace.** Semesters, reporting periods, and instructional-time requirements are built for everyone to finish together. A learner who needs more time or is ready early creates a reconciliation problem someone has to solve. Bismarck required an instructional-time waiver. Northern Cass allows learners to continue working on standards across school years. STEAM Academy created an additional semester and a replacement grade. Del Lago Academy sets defined time limits before an unresolved grade becomes an F. State testing schedules may still require learners to test at a set time regardless of demonstrated readiness.
- 2. Grading converts evidence into a single mark and loses the record of progress.** A school may treat revision as continued learning while the grading system preserves earlier performance, obscuring what the learner ultimately demonstrated. Each school builds its own conversion. Empower[Ed] turns mastery information into course grades and credits, Da Vinci connects its mastery scale to letter grades and GPA, and Crosstown High converts competency-oriented assessment into numeric course grades.
- 3. Credit and certification rules determine whether learning outside the classroom counts.** Projects, internships, and community experiences generate competency evidence, but recognition depends on policies governing work-based learning, alternative credit, educator licensure and assignment, course coding, and transcripts. Harwood's district policy requires advance approval, comparable rigor, certification by a licensed educator, and formal reporting, which protects rigor and does the translation work at the same time. Bismarck ensures that appropriately licensed educators certify learning for credit. STEAM Academy funds a community partnerships and internships coordinator, and Crosstown High runs a work-based learning course that handles coordination, placements, reflection, and evidence review.
- 4. Data systems cannot hold competency information, so schools run parallel systems.** Competency frameworks often do not map onto student information systems. Bismarck and Crosstown High keep competency information in one system while required reporting happens in another, and Lindsay maintains proficiency information in one platform and administrative records in another. The cost reaches the evidence base itself. This study could only examine the relationship between competency evidence and external academic measures at two

schools, because the records at other schools would not connect.

5. **Records and transcripts carry credits and GPA, not competency or demonstrations of learning.** Portfolios, exhibitions, and applied work rarely appear in the records that leave a school. Grades, credit, transcripts, reporting, or course coding surfaced in 10 of 17 policy conversations, and assessment or accountability surfaced in 13 of 17. Clark Street's district has pursued repeated waivers addressing GPA- and class-rank-based requirements its mastery record does not fit, which resolves each immediate issue while leaving the mismatch in place. Crosstown High's school improvement plan, filed with the state, describes performance entirely in conventional assessment terms and never mentions the competency framework underlying its academic program. Three schools in two states, under three different governance arrangements, independently adopted the same nonprofit mastery transcript, filling a gap no state in this study addresses.

The translation tax is not a design flaw in any school or a failure of any state. It is the cost of running competency-based learning inside systems built for something else, and schools pay it continuously, out of local capacity, with no external recognition that the work is happening. **That creates a clear policy opportunity: reduce what schools have to translate, and make the resulting evidence recognizable beyond the school.**

Making Competency-Based Learning Visible in Practice and Policy

This study set out to understand what CBL looks like at the level of the learner and then to identify the policy conditions that enable or hinder it. The field typically begins with authorization at the model level. Instead, policies to enable CBL should begin with the learner experience and then ask which rules define the evidence that counts, who holds authority over those rules, and what would make that authority usable. Starting with a policy lever and hoping it reaches learners has produced permission that sits unused, vision statements without implementation, and waivers that change the calendar but not the record.

The three recurring learner markers offer a practical starting point. Each points to specific policy moves that could make CBL more durable.

What you can show determines what comes next (*Mastery-Based Progression*). Demonstrated proficiency must carry consequences for progression and credit. States should:

- * Connect existing mastery-credit authority to schools already practicing it. Kentucky's regulation fits STEAM Academy closely and sits unused, and Wisconsin's was available to Clark Street. Audits of existing authority, paired with model board policy language, would cost little and unlock what already exists.

- * Convert demonstrated waiver-based programs into standing statutory options. Northern Cass operates through standing authority, while Bismarck's comparable program remains administratively provisional.
- * Extend authority where it is genuinely absent. Tennessee's competency-credit provision covers virtual schools only.
- * Reconcile the calendar. Instructional-time flexibility, reporting periods that accommodate continued work, and assessment timing that reflects readiness all let progression follow evidence rather than the semester.

Your strongest evidence counts, not your first attempt (*Iterative Purpose*). Feedback and additional attempts should produce evidence that counts, so the record reflects what a learner ultimately demonstrated rather than an earlier attempt. No state provision in this study governs feedback and revision, which means the lever is local, not statutory or regulatory. States need:

- * Adoptable grading and reassessment policy language that defines whether newer evidence may replace or supplement earlier performance and how multiple attempts contribute to a course grade.
- * Student information systems that hold revision history rather than a single mark, so what a learner finally demonstrated survives the conversion.
- * State guidance confirming that local reassessment practice does not conflict with reporting-period and accountability requirements.

Real work counts as evidence of learning (*Rigorous Application of Learning*). Whether a project, a portfolio, or an internship, learning produced outside the classroom must become part of a student's official record, with someone authorized to certify it and somewhere for it to sit. States need:

- * Approval, certification, and reporting processes that let outside learning fulfill graduation requirements. Harwood's district policy shows what this machinery looks like when it works.
- * Course code libraries that cover interdisciplinary, applied, and work-based experiences, so new designs have somewhere to sit.
- * Licensure and assignment rules that address who may supervise, assess, and certify learning that happens beyond a classroom.

Most critical, high-quality CBL evidence needs to travel. State agencies and system leaders need to develop shared specifications for carrying competency data and demand infrastructure for translating between competency-based experiences and conventional transcripts, replacing ten local solutions with instruments any school could adopt. Until records connect, the field cannot study whether these experiences relate to academic, postsecondary, or longer-term outcomes.

Ten schools produced competency-based learner experiences through different models, organizational forms, and policy environments. No single model or policy pathway emerged as the one best way to create them. The task ahead is not to standardize how schools approach CBL or how states write policy to enable it. It is to become specific about what learners should experience, and then build the policy and infrastructure capable of recognizing and scaling it.



Building Bridges. Transforming Systems. Realizing Potential.